



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SLR:KAN:JHK

*610 Federal Plaza, 5th Floor
Central Islip, New York 11722*

August 5, 2013

VIA ELECTRONIC FILING

Honorable Joanna Seybert
United States District Judge
Eastern District of New York
Long Island Federal Courthouse
Central Islip, New York 11722

Re: United States v. Hatfield, Brooks
Criminal Action No. 06 CR 0550 (S-2) (JS)

Dear Judge Seybert:

The United States respectfully requests permission to file an oversize reply brief in support of its cross-motion for reconsideration of preliminary order of forfeiture. Part IV, section C of your Honor's individual motion practices limits reply memoranda of law of ten pages or less. Here, however, the government requires additional pages to address several arguments raised by Brooks for the first time in his July 26, 2013 reply/opposition memorandum of law. Accordingly, the government respectfully requests that the Court grant the government leave to file a reply memorandum of no more than fifteen pages, *nunc pro tunc*.

Thank you for Your Honors consideration of this application.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: s/ James H. Knapp
James H. Knapp
Assistant U.S. Attorney
(631) 715-7879

To: **Via ECF**
Tai H. Park, Esq.